

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

EDMAR FINANCIAL COMPANY, LLC; IRISH
BLUE & GOLD, INC.; and XTX MARKETS
LIMITED,

Plaintiffs,

v.

CURRENEX, INC.; GOLDMAN SACHS & CO.
LLC; HC TECHNOLOGIES, LLC; STATE
STREET BANK AND TRUST COMPANY;
STATE STREET GLOBAL MARKETS
INTERNATIONAL LIMITED; and JOHN DOE
DEFENDANTS 1-5,

Defendants.

Case No. 1:21-cv-06598 (LAK)

**JOINT STIPULATION AND [PROPOSED] ORDER REGARDING CASE
MANAGEMENT SCHEDULE EXTENSION**

WHEREAS, on July 31, 2024, the parties in the above-captioned case filed a letter requesting the Court approve the jointly proposed modified scheduling order attached thereto as Exhibit A (ECF No. 142);

WHEREAS, on August 15, 2024, the Court entered an order granting the jointly proposed modified scheduling order (ECF No. 143);

WHEREAS, due to the complexities and data-driven nature of this case, the parties jointly request that certain Case Management Schedule dates be extended to permit time for the parties to complete discovery in advance of class certification briefing and any Daubert challenges;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and among the undersigned counsel for the signatory parties, subject to the Court's approval, that the Case Management Schedule be modified to reflect the following extensions:¹

Event	Current Schedule	Proposed Extension
Fact discovery commences, and parties may serve discovery requests.	Friday, August 18, 2023	n/a
Disclosure of witnesses covered by 26(a)(1)(A)(i) (in lieu of full Rule 26(a) disclosures).	Monday, August 21, 2023	n/a
Parties to jointly submit to the Court proposed ESI order and proposed protective order.	Monday, August 28, 2023	n/a
Parties to meet and confer regarding forms and types of structured/transactional data.	Monday, September 11, 2023	n/a
Rolling productions of documents begin.	Saturday, November 18, 2023	n/a
Deadline to add parties.	Monday, March 18, 2024	n/a
Substantial completion of production of documents, including transactional data.	Tuesday, December 17, 2024	n/a
Deadline for serving RFAs and interrogatories.	Friday, April 18, 2025	Monday, August 18, 2025
Completion of fact discovery, including all depositions of fact witnesses.	Monday, May 19, 2025	Friday, September 19, 2025

¹ All interim deadlines other than class certification motions may be extended by agreement of the parties. See Endorsed Case Management Schedule (ECF No. 98).

Event	Current Schedule	Proposed Extension
Class certification motion due and supporting expert reports due, including all data and code relied upon by Plaintiffs' experts.	Friday, July 18, 2025	Tuesday, November 18, 2025
Class certification opposition and supporting expert reports due, including all data and code relied upon by Defendants' experts. Any Daubert challenges to Plaintiffs' class certification experts due, including all data and code relied upon by Defendants' experts.	Tuesday, October 21, 2025	Monday, February 23, 2026
Class certification reply and any supporting reply expert reports due, including all data and code relied upon by Plaintiffs' experts. Plaintiffs' oppositions to any Daubert motions by Defendants due, including all data and code relied upon by Plaintiffs' experts. Any Daubert challenges to Defendants' class certification experts due, including all data and code relied upon by Plaintiffs' experts.	Friday, December 19, 2025	Monday, April 20, 2026

Event	Current Schedule	Proposed Extension
Defendants' replies in support of Defendants' Daubert motions due (including all data and code relied upon by Defendants' experts). Defendants' oppositions to Plaintiffs' Daubert motions due (including all data and code relied upon by Defendants' experts).	Tuesday, February 03, 2026	Wednesday, June 3, 2026
Plaintiffs' replies in support of Plaintiffs' Daubert motions due (including all data and code relied upon by Plaintiffs' experts).	Friday, March 06, 2026	Monday, July 6, 2026
Additional expert discovery.	Parties to confer and submit proposal within 30 days of class certification ruling.	Parties to confer and submit proposal within 30 days of class certification ruling.
Deadline for summary judgment motions.	Within 90 days of the close of expert discovery.	Within 90 days of the close of expert discovery.

IT IS SO ORDERED.

DATED: _____

THE HONORABLE LEWIS A. KAPLAN
UNITED STATES DISTRICT JUDGE

Dated: May 6, 2025
New York, New York

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